

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DR. VANESSA GARCIA,)	
)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 3:18-cv-00814
THE METROPOLITAN)	JURY DEMANDED
GOVERNMENT OF NASHVILLE AND)	
DAVIDSON COUNTY, TENNESSEE,)	Judge Campbell
)	Magistrate Newbern
Defendant.)	

DEFENDANT'S EXHIBIT LIST

Defendant Metropolitan Government of Nashville and Davidson County, Tennessee (“Defendant” or “Metro Schools”) hereby provides notice, pursuant to Federal Rule of Civil Procedure 26(a)(3), that it may use the following documents or things as exhibits at trial:

1. MNPS Employee Harassment Policy (MNPS 0702-06)
2. MNPS Employee Harassment Policy (00076-80)
3. MNPS Substance, Sexual Harassment, and Smokeless Workplace Policy Acknowledgments (MNPS 0023)
4. Custodian affidavit and documents provided by Let's Face it (Let's Face It 0001-08)
5. Custodian affidavit and documents provided by Trevecca Nazarene (Trevecca 00001-03)
6. Custodian affidavit and documents provided by Dr. Robert Richter (Dr. Richter 0001-0005)
7. Custodian affidavit and documents provided by Sprint (Sprint 000001-001522)

8. Custodian affidavit and documents provided by Verizon Wireless (Verizon 000001-001225)
9. Custodian letter and documents provided by Lipscomb University (Lipscomb 0001-0063)
10. Custodian affidavit and documents provided by Trevecca Nazarene University (Trevecca 0001-0003)
11. MNPS Interview Statement dated 11/15/17 (MNPS 0176-77)
12. Letter from Ms. Story to Mr. Carrasco dated 1/17/18 (Exhibit 13 to Plaintiff's Deposition)
13. Letter from Ms. Story to Dr. Garcia dated 5/11/18 (000082)
14. Letter from Ms. Story to Dr. Garcia dated 4/25/18 (000165)
15. 2017 application with the TN Department of Education (Exhibit 17 to Plaintiff's Deposition)
16. Job description for Executive Director Leadership Development (Exhibit 1 to Dr. Shawn Joseph's Deposition)
17. Text message between Scott Lindsey and Dr. Garcia (000311-315)
18. Human Resources and Organizational Development Charts
19. Interview Statements of Plaintiff (MNPS 0176-0177, MNPS 0186)
20. Interview Statement of Nicole Cobb (MNPS 0179)
21. Interview Statement of Sonia Stewart (MNPS 0181)
22. Interview Statement of Kyla Krengel (MNPS 0182)
23. Interview Statement of David Williams (MNPS 0183)
24. Signed note from Scott Lindsey regarding his telephone call with Tia Haddock

(MNPS 0184)

25. Interview Statement of Bill Warren (MNPS 0185)
26. Interview Statement of Judy Vokes (MNPS 0187)
27. Interview Statement of Aimee Wyatt (MNPS 0188)
28. Interview Statement of Marissa Stanley (MNPS 0189-0190)
29. November 22, 2017 Modification of Statement letter from Jennifer Bell (MNPS 0193)
30. Investigation Questions to Moreno Carrasco (MNPS 0194-0200)
31. Interview Statement of Hank Clay (MNPS 0202-0203)
32. Interview Statement of Cassandra Swinney (MNPS 0228)
33. December 7, 2017 emails between Sharon Pertiller and Moreno Carrasco (MNPS 0211-0213)
34. May 11, 2018 letter to Dr. Garcia from Deborah Story regarding elimination of position (000082)
35. Screen shots of texts between Plaintiff and Carrasco (Carrasco 000001-000005)
36. Demonstrative spreadsheets of calls and texts between Plaintiff and Moreno Carrasco
37. Plaintiff's August 3, 2018 Charge of Discrimination
38. Plaintiff's August 24, 2018 Charge of Discrimination
39. Plaintiff's Complaint
40. Plaintiff's Amended Complaint
41. Plaintiff's Responses to Defendant's First Set of Interrogatories and Requests for Production of Documents

42. January 14, 2019 letter supplementing Plaintiff's Responses to Defendant's First Set

of Interrogatories and Requests for Production of Documents

43. Plaintiff's deposition transcript
44. Dr. Charles Baum's deposition transcript

Defendant reserves the right to use any of the following as exhibits:

- a. Any pleading filed in this case;
- b. Any document produced by Plaintiff in Response to Defendant's Request for Production of Documents or otherwise produced during discovery as supplementation of discovery;
- c. Any document produced by Defendant during discovery;
- d. The transcript of any depositions taken in this case;
- e. Any exhibit to the depositions taken in this case;
- f. Any exhibit listed on the Plaintiff's exhibit list; and

Defendant also reserves the right to use any other exhibits not identified herein as rebuttal or impeachment exhibits pursuant to Federal Rule of Civil Procedure 26(a)(3). Further, Defendant reserves the right to supplement this exhibit list and will do so promptly, if necessary. Finally, Defendant objects to Plaintiff's exhibit list to the extent that any of Plaintiff's exhibits were not produced to Defendant during discovery.

Respectfully submitted,

s/ Charles K. Grant

Charles K. Grant, BPR No. 17081

Sharonda Fancher, (admitted pro hac vice)

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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2019, a copy of the foregoing *Defendant's Witness List* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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s/ Charles K. Grant
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